Comments of New York State Department of Public Service

OPS Initiative on Integrity Management and Protection of High Consequence Areas

We recognize and support the need for federal requirements for pipeline system integrity management programs (IMP). The actual physical condition of many older transmission pipelines is largely unknown if we depend on mere compliance with existing requirements for various inspections, patrols, leak surveys, and cathodic protection monitoring. The current MAOPs of many pipelines are based on hydro-tests done decades ago immediately after construction, which does nothing to prove the integrity of the pipeline today. Without such federal requirements addressing system integrity management issues, pipeline operators may continue to choose not to periodically, systematically, and comprehensively evaluate the integrity of their transmission systems.

The two-pronged approach of the draft conceptual model is, we believe, the correct approach. Absent an integrated risk assessment model for pipeline integrity management, an operator should be required to comply with minimum requirements for testing, evaluation, and repair of pipeline segments. The integrity management program should apply to all transmission pipeline facilities, not just those deemed to be in high consequence areas. Also, Option #1 of the draft conceptual plan should specify a frequency for close interval cathodic protection surveys as well as for hydro-testing and in line inspections. New York has found close interval surveys to be a very useful tool in assessing the cathodic protection of pipeline segments along their entire lengths, as opposed to monitoring a pipeline at test stations which may or may not give a true representation of the state of protection along the entire segment.

Attempting to define a HCA must involve consideration of many factors and therfore would be would be difficult, controversial, subject to varying interpretations, and may be unnecessary. Rather, an operator's integrity management program model should apply to all transmission lines, incorporate all relevant attributes for the pipeline segments and prioritize segments for defined mitigative measures. If the model is properly developed and applied, a high consequence component will result in greater associated risk of failure, and thus be a higher priority for repair, replacement, or other appropriate cost effective remedial actions.

The NYDPS is currently working with its LDCs to develop and institute risk assessment models to rank segments of transmission pipelines according to relative risk of failure, and to provide options for mitigating risk to improve the "score" or ranking of a pipeline segment. The model in this approach utilizes algorithms that consider the probabilities and consequences of pipeline failures related to corrosion, material defects, mechanical damage, and outside forces.

Initially OPS and the States must verify that operators' IMPs are comprehensive and meet the intent of regulations. Where possible, OPS and/or States should be involved in development of the

programs. An operator must maintain adequate records and documentation for audit purposes in order for OPS or the States to confirm that the programs are working as they should, from analysis through mitigative response. The success of any program as important as this depends as much on quality assurance within the program as it does on the program development and implementation. Effective quality controls built into the program provide the checks and balances necessary to identify and remedy problems, and prevent recurrence.